



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JN/DKK/LB/CJN
F. #2017R05903

*271 Cadman Plaza East
Brooklyn, New York 11201*

March 18, 2020

By Email and ECF

Michael Levy
Joan M. Loughnane
Sidley Austin LLP

David Bitkower
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Re: United States v. Huawei Technologies Co., Ltd., et al.
Criminal Docket No. 18-457 (S-3) (AMD)

Dear Counsel:

Enclosed please find the government's production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the government's previous productions. The discovery is being produced pursuant to the Protective Order entered by the Court on June 10, 2019. See ECF Docket Entry No. 57. The government also requests reciprocal discovery from the defendant.

This discovery is only being provided to Huawei Technologies Co., Ltd. and Huawei Device USA Inc. Although Huawei Device Co. Ltd. and Futurewei Technologies, Inc. are newly indicted defendants in this case, neither is entitled to this discovery because they are not parties to the protective order.

I. The Government's Discovery

Document Description	Category of Discovery Pursuant to Protective Order	Bates Range
Financial Institution Documents, Including Customer Account Information and Written Correspondence	Sensitive Discovery Material	DOJ_HUAWEI_A_0004546137 - DOJ_HUAWEI_A_0004559024
Financial Institution Documents, Including Customer Account Information and Written Correspondence	Discovery Material	DOJ_HUAWEI_A_0004559025 – DOJ_HUAWEI_A_0004561808

Very truly yours,

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By: /s/ Thea D. R. Kendler
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cc: Clerk of the Court (AMD) (by ECF) (without Enclosures)